

Application No. 10/726,722
Response dated: January 5, 2006
Reply to Office action of November 8, 2005

REMARKS

In response to the Office Action dated November 8, 2005, Applicants respectfully requests reconsideration based on the above claim amendments and the following remarks. Applicants respectfully submit that the claims as presented are in condition for allowance.

Claims 1-28 are pending in the present Application. Claims 1, 5, 7, 21 and 28 have been amended, leaving Claims 1-28 for consideration upon entry of the present amendments and following remarks.

Support for the amendments to the claims can at least be found in the specification, the figures, and the claims as originally filed. More particularly, support for amended Claims 1 and 28 are at least found at Figure 2 and page 12, lines 2-6 of the specification. Claims 5, 7 and 21 have been amended to correct an inadvertent typographical error.

No new matter has been introduced by these amendments. Reconsideration and allowance of the claims are respectfully requested in view of the above amendments and the following remarks.

Claim Rejections Under 35 U.S.C. §102

Claims 1, 2, 4, 5, and 10 have been rejected under 35 USC 102(b) as being allegedly anticipated by U. S. Patent No. 6,435,685 issued to Matsushita (hereinafter "Matsushita"). Applicants respectfully traverse.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. V. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Amended Claim 1 recites, *inter alia*, "a light interceptive part being separate from the lamp reflector and interposed between the light-emitting surface and the lamp reflector, and preventing the light from the lamp from entering through an edge at which the light-entering surface and the light-emitting surface are intersected."

In the Office Action, turn-ups 281,282 of Matsushita are considered the light interceptive part of the claimed invention. Matsushita discloses a bend or a J-curve portion may be formed in one or two distal end portions of the reflector. (Col. 3, lines 28-32.) Referring to Figure 4, both

Application No. 10/726,722
Response dated: January 5, 2006
Reply to Office action of November 8, 2005

the distal end portions *of the reflector 28* have turn-ups 281,282. (Col. 8, lines 52 and 53.) That is, the turn-ups 281,282 are part of the reflector and not a separate element. Therefore, Matsushita does not disclose a light interceptive part being separate from the lamp reflector and interposed between the light-emitting surface and the lamp reflector of amended Claim 1.

Regarding Claim 5, Applicants respectfully note that no rejection details are provided and the Examiner has not stated with specificity where such disclosure may be found in Matsushita. However, regarding Claim 7 which has substantially similar limitations as Claim 5, it is alleged that Matsushita discloses and illustrates in Figure 4 that light interceptive part has a C-shaped cross section. (Page 4 of the Office Action.) Applicants respectfully disagree.

As discussed above, the turn-ups 281,282 (considered the light interceptive part) are merely *bends in distal end portions of the reflector 28*. If the reflector 28 is considered to include the substantially straight portion before the bending of the turn-ups 281,282, then the turn-ups 281,282 are merely the bend or J-curved portion at the end of that straight portion. That is, the turn-ups do not form a C-shape, but at best a J-curved portion as specifically disclosed by Matsushita. Therefore, Matsushita does not disclose the light interceptive part has a "C"-shaped cross section of Claim 5.

Alternatively, if the turn-ups 281,282 are considered to be C-shaped, the turn-ups 281,282 clearly are not *fitted on the edge of the lamp reflector 28* as claimed. The turn-ups 281,282 are merely extensions of the reflector 28 as specifically disclosed and illustrated by Matsushita. Therefore, Matsushita also does not disclose the light interceptive part has a "C"-shaped cross section so as to be fitted on the edge of the lamp reflector of Claim 5.

Thus, Matsushita does not teach all of the limitations of at least amended Claims 1 and 5. Accordingly, Matsushita does not anticipate Claims 1 and 5. Applicants respectfully contend that Claims 1 and 5 are not further rejected or objected and are therefore allowable. Claims 2, 4 and 10 variously depend from Claim 1, include all of the limitations of Claim 1 and are correspondingly allowable as depending upon allowable Claim 1. Reconsideration, entry of the present amendment and allowance of Claims 1, 2, 4, 5, and 10 is respectfully requested.

Application No. 10/726,722
Response dated: January 5, 2006
Reply to Office action of November 8, 2005

Claim Rejections Under 35 U.S.C. §103

Regarding Claims 3, 6, 7 and 28

Claims 3, 6, 7, and 28 have been rejected under 35 USC 103(a) as being allegedly unpatentable over Matsushita. Applicants respectfully traverse.

For an obviousness rejection to be proper, the Examiner must meet the burden of establishing that all elements of the invention are disclosed in the prior art and that the prior art relied upon, coupled with knowledge generally available in the art at the time of the invention, must contain some suggestion or incentive that would have motivated the skilled artisan to modify a reference or combined references. *In re Fine*, 5 U.S.P.Q.2d 1596, 1598 (Fed. Cir. 1988); *In Re Wilson*, 165 U.S.P.Q. 494, 496 (C.C.P.A. 1970); *Amgen v. Chugai Pharmaceuticals Co.*, 927 U.S.P.Q.2d, 1016, 1023 (Fed. Cir. 1996).

Regarding Claim 7, Matsushita does not disclose the light interceptive part has a "C"-shaped cross section so as to be fitted on the edge of the lamp reflector for all the reasons stated above with regard to Claim 5. Therefore, Matsushita does not disclose all of the limitations of Claim 7.

Claims 3, 6 and 7 variously depend from Claim 1 and therefore inherit all the limitations of Claim 1. As discussed above, Matsushita does not disclose all of the limitations of amended Claim 1 and consequently, Claims 3, 6 and 7.

Regarding Claim 28, Applicants respectfully note that no rejection details are provided and the Examiner has not stated with specificity where such disclosure may be found in Matsushita. Amended Claim 28 recites, *inter alia*, "a light interceptive part being separate from the lamp reflector and interposed between the light-emitting surface and the lamp reflector, and preventing the light from the lamp from entering through an edge at which the light-entering surface and the light-emitting surface are intersected."

Matsushita does not disclose a light interceptive part being separate from the lamp reflector and interposed between the light-emitting surface and the lamp reflector for all the reasons stated above with regard to Claim 1. Therefore, Matsushita does not disclose all of the limitations of Claim 28.

Application No. 10/726,722
Response dated: January 5, 2006
Reply to Office action of November 8, 2005

Regarding Claims 8 and 9

Claims 8 and 9 have been rejected under 35 USC 103(a) as being allegedly unpatentable over Matsushita in view of U.S. Patent No. 6,443,583 issued to Ha or U.S. Patent No. 6,074,070 issued to Sasako. Applicants respectfully traverse.

Claims 8 and 9 variously depend from Claim 1 and therefore inherit all the limitations of Claim 1. As discussed above, Matsushita does not disclose all of the limitations of amended Claim 1 and consequently, Claims 8 and 9.

Ha is relied upon to disclose a printed part on the surface of the reflector. Therefore, Ha does not disclose a light interceptive part being separate from the lamp reflector and interposed between the light-emitting surface and the lamp reflector and does not cure the deficiencies of Matsushita. In fact, as stated in the Office Action at the bottom of page 4 to the top of page 5, Ha is indicated as teaching to the contrary. That is, Ha discloses printing on the surface of the reflector for ease of manufacture by *eliminating the need for a separate interceptive part*.

Sasako also does not disclose a light interceptive part being separate from the lamp reflector and interposed between the light-emitting surface and the lamp reflector and does not cure the deficiencies of Matsushita.

Regarding Claim 28

Claim 28 has been rejected under 35 USC 103(a) as being allegedly unpatentable over U.S. Patent 6,502,947 to Matsumoto in view of Matsushita. Applicants respectfully traverse.

In the Office Action details, it is respectfully conceded that Matsumoto does not disclose a light interceptive part interposed between the light emitting surface and the lamp reflector. As discussed above, Matsushita does not disclose all of the limitations of Claim 28, particularly, a light interceptive part being separate from the lamp reflector and interposed between the light-emitting surface and the lamp reflector.

Since Matsushita, Ha, Sasako and Matsumoto, alone or in combination, do not teach or suggest all of the limitations of Claims 3, 6-9 and 28, as discussed above, *prima facie* obviousness does not exist regarding Claims 3, 6-9 and 28 with respect to the Matsushita patents.

Application No. 10/726,722
Response dated: January 5, 2006
Reply to Office action of November 8, 2005

Additionally, since Matsushita fails to teach or suggest all of the limitations of Claims 3, 6-9 and 28, clearly, one of ordinary skill at the time of Applicants' invention would not have neither a motivation to modify the reference, nor a reasonable likelihood of success in forming the claimed invention by the Examiner's suggestion of modifying the reference. Thus, here again, *prima facie* obviousness does not exist. *Id.*

Thus, the requirements of *prime facie* obviousness do not exist regarding Claims 3, 6-9 and 28 with respect to Matsushita. Applicants respectfully submit that Claims 3, 6-9 and 28 are not further rejected or objected to and are thus allowable. Reconsideration and allowance of Claims 3, 6-9 and 28 is respectfully requested.

Allowable Subject Matter

Applicants gratefully acknowledge the Examiner's noting the allowable Claims 15-27.

Applicants also gratefully acknowledge the Examiner's noting the allowable subject matter in Claims 11-14, but Applicant respectfully submits that independent Claim 1, from which Claims 11-14 variously depend, is novel and non-obvious over cited prior art, as discussed above. As such, Applicants have not rewritten Claims 11-14 in independent form at this time.

Conclusion

In view of the foregoing, it is respectfully submitted that the instant application is in condition for allowance. Accordingly, it is respectfully requested that this application be allowed and a Notice of Allowance issued. If the Examiner believes that a telephone conference with Applicants' attorneys would be advantageous to the disposition of this case, the Examiner is cordially requested to telephone the undersigned.

Application No. 10/726,722
Response dated: January 5, 2006
Reply to Office action of November 8, 2005

In the event the Commissioner of Patents and Trademarks deems additional fees to be due in connection with this application, Applicants' attorney hereby authorizes that such fee be charged to Deposit Account No. 06-1130.

Respectfully submitted,

CANTOR COLBURN LLP

By: Amy Bizon-Copp
Amy Bizon-Copp
Reg. No. 53,993
CANTOR COLBURN LLP
55 Griffin Road South
Bloomfield, CT 06002
Telephone (860) 286-2929
Facsimile (860) 286-0115

Date: January 5, 2006